



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

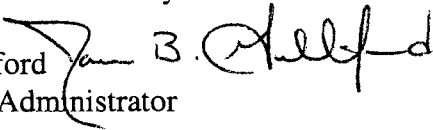
REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

MAY 13 2002

OFFICE OF  
THE REGIONAL ADMINISTRATOR

**MEMORANDUM**

SUBJECT: Low Inspection Priority for Performance Track Facilities

FROM: Jim Gulliford   
Regional Administrator

TO: All Regional Staff

The National Environmental Performance Track Program is designed to motivate and reward top environmental performance. Since the Program's launch in Summer 2000, several Region 7 facilities have been accepted as participants. One of the important incentives offered to facilities in this program is a "low enforcement inspection priority." Attached are Region 7's guidelines for conducting inspections at National Environmental Performance Track facilities.

I fully support this partnership program and request that Division Directors, Branch Managers and others involved in inspection targeting decisions familiarize themselves with the program and be aware of facilities in our Region that have joined this program. Since there are two opportunities each year for facilities to join the Performance Track program, new facilities will continue to be added. Prior to doing inspections, please check the listing of Performance Track Partners at [www.epa.gov/rgytgrnj/specinit/p2/volprog/ptrack.htm](http://www.epa.gov/rgytgrnj/specinit/p2/volprog/ptrack.htm). If the facility to be inspected is a Performance Track Partner, please contact Cecilia Tapia, (Director, Enforcement Coordination Office) at x7733 or Mary Carter (Branch Chief, Solid Waste and Pollution Prevention Branch) at x7350. Please feel free to contact Chet McLaughlin, at x7666, for questions about or information on the National Environmental Performance Track Program.

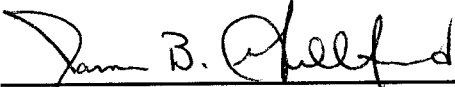
Attachment

*Region 7 Guidelines*  
*for*  
Inspection Priorities  
National Environmental Performance Track

These guidelines are in effect for U.S. EPA Region 7 with regard to facilities which have been accepted for inclusion into the National Environmental Performance Track Program (Performance Track). They provide a decision-making tool for use by all regional personnel, in making available the "low inspection priority" incentive offered by the Performance Track program. These guidelines apply to federal inspections carried out by the Region through its compliance programs. The guidelines are optional for States, but the Region will work with States who wish to implement this approach for inspections of Performance Track members. Consultation with the Regional Performance Track Coordinator and with OECA is encouraged during the early stages of implementing this program, as many decisions will be highly case- and fact-specific.

Facilities which are members of Performance Track will be considered low priority for routine inspections. Since most inspections are routine, it is unlikely Performance Track facilities will be inspected unless there is cause to believe a problem exists. If regional personnel believe a problem exists they are encouraged to discuss inspection approaches with the Regional Performance Track Coordinator, the Enforcement Coordinator and with the Office of Planning, Policy Analysis and Communication in OECA. Facilities may be inspected:

- ▶ If the facility should in any way represent an immediate threat to human health or safety.
- ▶ Where there is a specific complaint, emergency release, or spill.
- ▶ When there is a showing of evidence of a violation of permit or law.
- ▶ As a part of a major enforcement initiative.

  
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Jim Gulliford

May 11, 02  
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Date